

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

EDWARD CARTER, FRANK FIORILLO,
KEVIN LAMM, JOSEPH NOFI, and THOMAS
SNYDER,

Plaintiffs,

-against-

INCORPORATED VILLAGE OF OCEAN
BEACH; MAYOR JOSEPH C. LOEFFLER,
JR., individually and in his official capacity;
former mayor NATALIE K. ROGERS,
individually and in her official capacity,
OCEAN BEACH POLICE DEPARTMENT;
ACTING DEPUTY POLICE CHIEF GEORGE
B. HESSE, individually and in his official
capacity; SUFFOLK COUNTY; SUFFOLK
COUNTY POLICE DEPARTMENT; SUFFOLK
COUNTY DEPARTMENT OF CIVIL SERVICE;
and ALISON SANCHEZ, individually and in
her official capacity,

Defendants.

**DEFENDANT
SANCHEZ'S
RESPONSES TO FIRST
SET OF
INTERROGATORIES**

**CV 07-1215
(SJF)(ETB)**

Defendant, Alison Sanchez, by her attorney, hereby responds, upon information and belief, to the plaintiff's First Set of Interrogatories dated July 14, 2009.

PRELIMINARY STATEMENT

These responses are made solely for the purpose of this action. Each response is subject to all objections as to competence, relevance, materiality, propriety and admissibility, and any and all other objections and grounds which would require the exclusion of any statement herein if the interrogatories were asked of, or any statement contained herein were made by, a witness present and testifying in court, all of which objections and grounds are reserved and may be interposed at the time of trial.

Defendant reserves the right to make any changes in these answers if it appears that omissions or errors have been made herein, or that further or more accurate information is available.

Defendant has not completed her investigation of the facts relating to this action, and has not completed preparation for trial. The following answers are based on information presently available, and are made without prejudice to defendant's right to utilize subsequently discovered facts.

Except for explicit facts admitted herein, no incidental or implied admissions are intended hereby. The fact that defendant has answered any interrogatory should not be taken as an admission that defendant accepts or admits the existence of any facts set forth or assumed by such interrogatory, or that such answer constitutes admissible evidence. The fact that this defendant has answered any or all of any interrogatory is not intended, and shall not be construed to be a waiver by defendant of all or part of any objection to any interrogatory.

1. Objection on grounds of relevance, materiality and overbreadth. While fully reserving her rights under said objections, answering defendant responds that she does not believe, but does not know with certainty if she posted the post entitled "burning bridges" on


April 6, 2006, although she does not believe that she did. Answering defendants did post entries nos. 33, 40 & 41 on the Schwartz Report thread "Ocean Beach Police Corruption".

Dated: Hauppauge, New York
August 11, 2009

Yours, etc.,

CHRISTINE MALAFI
Suffolk County Attorney
Attorney for County Defendants
H. Lee Dennison Building
100 Veterans Memorial Highway
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(631) 853-4049

By:


ARLENE S. ZWILLING (AZ 5918)
Assistant County Attorney

TO:

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VERIFICATION

STATE OF NEW YORK)
COUNTY OF SUFFOLK) ss.:

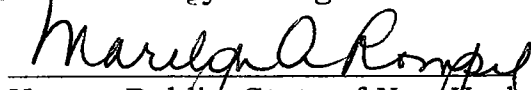
ALISON SANCHEZ, being first duly sworn, hereby deposes and states:

I am a defendant in the within action. I have read the foregoing Responses to Plaintiff's First Set of Interrogatories and Request for Production of Documents in Edward Carter, et al. v. The County of Suffolk, et al., Index No. CV07-1215 (SJF)(ETB), and know the contents thereof. The responses, which were drafted and prepared by the Suffolk County Attorney's Office, appear to be true to my own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters, I believe them to be true.



Alison Sanchez

Subscribed and sworn to before me
this 11th day of August 2009.


Notary Public, State of New York

